

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
V.	)	Criminal No: 05-10003-NMG
	)	
ARTHUR GIANELLI,	)	
MARY ANN GIANELLI, et al	)	
	)	

JOINT MOTION TO EXTEND TIME TO FILE SUBSTANTIVE MOTIONS

Now come the defendants, Arthur Gianelli, Mary Ann Gianelli, Gisele Albertini, Stephen Russo, Rafia Feghy, Randy Albertelli, Salvatore Ramasci, and Frank Iacaboni, in the above-referenced matter and respectfully request this Honorable Court grant an extension of time to February 29, 2008 for filing of any substantive motions. As grounds therefore, the defendants state the following:

1. The substantive motions are currently due on December 7, 2007.
2. On November 19, 2007, the Court granted defendant Joseph Yerardi an extension until February 29, 2008 to file any substantive motions.
3. The defendants intend to collaborate on the motions and, as such, seek to file motions on the same date.
4. Defendant Puopolo objects to any extension.

WHEREFORE, the defendants respectfully request this Court grant an extension of time to February 29, 2008 to file any substantive motions.

Respectfully submitted,  
Defendant, Arthur Gianelli,  
By his attorney,

/s/ Richard M. Egbert

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Respectfully submitted,  
Defendant, Mary Ann Gianelli  
By her attorney,

/s/ E. Peter Parker

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Respectfully submitted,  
Defendant, Gisele Albertini,  
By her attorney,

/s/ Page Kelley

Page Kelley, Esquire  
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Respectfully submitted,  
Defendant, Stephen Russo,  
By his attorney,

/s/ Stephen J. Weymouth

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Respectfully submitted,  
Defendant, Frank Iacaboni,  
By his attorney,

/s/ Matthew D. Thompson  
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Respectfully submitted,  
Defendant, Randy Albertelli,  
By his attorneys,

/s/ Kevin S. Nixon  
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/s/ Raymond A. O'Hara  
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Respectfully submitted,  
Defendant, Rafia Feghi,  
By his attorneys,

/s/ Jeffrey A. Denner  
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Respectfully submitted,  
Defendant, Salvatore Ramasci,  
By his attorney,

/s/ Joseph J. Balliro, Jr.

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Dated: November 20, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 20<sup>th</sup> day of November, 2007.

/s/ Richard M. Egbert

Richard M. Egbert, Esquire